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COLUMBUS, OHIO

UNITED STATES DISTRICT COURT

for the

SOUTHERN District of C

Eastern Division

Salvatore J. Sowell

Case No.

2:25 CV 0595

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Huntington Bank

Jury Trial: (check one) ☐ Yes ☒ No

JUDGE MARBLEY

MAGISTRATE JUDGE DEEVERS

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Salvatore J. Sowell
Street Address	38 w greenwood ave
City and County	Columbus Franklin
State and Zip Code	Ohio 43201
Telephone Number	
E-mail Address	

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Huntington Bank
Job or Title <i>(if known)</i>	Financial Institution
Street Address	830 N.High St
City and County	Columbus Franklin
State and Zip Code	Ohio 43215
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

identity fraud and identity theft.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Before the court and Jana Litsey, the attorney for the defendant, personally comes the plaintiff, Salvatore Juliano Sowell, by and through counsel, who according to law, deposes and says that an employee of the defendant, a Ms. Jazmin Roederer at franklin county, ohio did: aiding and abetting in indentity theft based upon the attached affidavit.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

see attached

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 05/01/2025

Signature of Plaintiff Salvatore J.Sowell
 Printed Name of Plaintiff Salvatore Juliano Sowell

B. For Attorneys

Date of signing:

Signature of Attorney
 Printed Name of Attorney
 Bar Number
 Name of Law Firm
 Street Address
 State and Zip Code
 Telephone Number
 E-mail Address

IN THE UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

Salvatore Juliano Sowell

Plaintiff

v.

Huntington Bank

Defendant

2:25 CV 0595

Supporting Affidavit to Statement of Claim

Plaintiff states to court, and Jana Litsey, the attorney for the defendant, by and through this court, by and through counsel, that an employee of the defendant, a Ms. Jazmin Roederer had knowledge of, and failed to inform him of, an account opened in his name with the defendant, Huntington Bank, identified as CK4730 he never opened when he opened an account with the defendant, Huntington Bank, with the assistance of the defendant's aforementioned employee which he received emails about pertaining to inaccurate account balances that resulted from deposits made to, and withdrawals made from, the account identified as CK4730 which are as follows: one received on or about the 4 day of June, 2022, alleging a balance of - \$3,680.69, another received that same day alleging a check in the amount of \$3,681.00 had been processed bringing the balance from -\$3,680.69 to \$0.31 when it should've been \$0.00, and the last received on or about the 10 day of June, 2022, alleging a check in the amount of \$4,181.31 had been processed bringing the balance from \$0.31 to \$4,181.31 when it should've been \$4,181.62.

Sworn to by the plaintiff, by and through counsel, and by the plaintiff's attorney, to the clerk of this court, to the assigned judges, and to the defendant's attorney, under the penalty of perjury.

Respectfully Submitted,

Salvatore Juliano Sowell

Pro-se

Franklin County, Ohio

Thursday May 1, 2025